#### IOWA COLLEGE STUDENT AID COMMISSION

# Post University Application for Postsecondary Registration in Iowa July 29, 2016

STAFF ACTION: Approve Post University for registration in Iowa for a two-year term that begins on July 29, 2016, and ends on July 29, 2018.

## **Registration Purpose**

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this State or if the school otherwise has a presence in this State. Presence means a location in lowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Staff required Post University to both apply for registration in order to offer Iowa residents distance education programs that include a field experience that an Iowa resident would participate in at an Iowa location. In addition, the University compensates at least one Iowa resident to provide instruction in the University's online programs from the Iowa's home or other Iowa location.

## **Institutional Information**

Post University is a for-profit educational institution that is physically located at 800 Country Club Road, Waterbury, CT, 06723. The University's chief executive officer is John L. Hopkins, at 800 Country Club Road, Waterbury, CT 06723. Post University has registered with the Iowa Secretary of State as a for-profit corporation #456364, and their Iowa registered agent is National Corporate Research, Ltd, located at 400 Locust Street, Suite 400, Des Moines, Iowa 50309.

Post University discloses its ownership, Board of Trustees, and its Executive Leadership Team on its website:

- http://post.edu/about/ownership
- http://post.edu/about/board
- http://post.edu/about/executive-team

Post University is a wholly owned subsidiary of Post Education, Inc., which has four officers:

- Andrew Hertzmark, Managing Partner, Generation Partners Management, LLC, and Chairman and CEO, Officer, Post Education, Inc.
- Mark E. Jennings, Managing Partner, co-founder of Generation Partners Management, LLC, Director, Post Education, Inc.
- Louis Marino, Senior Vice President, Generation Partners Management, LLC, Officer, Secretary, Post Education, Inc.
- Bradley Palmer, Managing Partner, Palm Ventures and Director, Post Education, Inc.

The members of the University's Board of Trustees are as follows:

- O. Alton Barron, MD, Assistant Clinical Professor of Orthopedic Surgery at the Columbia College of Physicians and Surgeons in New York; a Senior Attending in the Department of Orthopedic Surgery, Director of Research, St. Luke's Roosevelt Hospital, New York, NY; Attending Hand Surgeon, CV Starr Hand Surgery Center
- Mark E Jennings, Managing Partner, Co-Founder, Generation Partners Management, LLC
- Andrew Hertzmark, Managing Partner, Generation Partners Management, LLC
- Bradley Palmer, Managing Partner, Founder, Palm Ventures
- Margaret Honey, Ph.D., President and CEO of the New York Hall of Science
- Selim G. Noujaim, Executive Vice President, Noujaim Tool Company, Inc., State of Connecticut, House of Representatives, 74<sup>th</sup> District
- Takashi Yamanaka, Administrator, Teikyo Education Foundation
- Connia Nelson, Senior Vice President of Human Resources, Verizon
- Thomas Samph, Ph.D., Chancellor, Post University, Inc.

Of the nine members of the Post University Governing Board, the University's parent company is represented by a minority of three individuals. Trustees Barron, Honey, Samph, Yamanaka, and Noujaim have prior professional experience in K-12 education and/or higher education teaching and administration, the development of curriculum and educational technologies, or education policy.

Post University's President is Don Mroz, Ph.D. Dr. Mroz is the founding Dean of the University's Malcolm Baldrige School of Business.

The University provided additional information about the roles of its Chancellor Dr. Samph, the University's President Dr. Mroz, and the University CEO John L. Hopkins. Until recently, Dr. Samph was the University's CEO and moved to the position of Chancellor in January 2016. His two primary roles consist of assisting with the transition of the new CEO, John L. Hopkins to facilitate a seamless transition within the organization. Dr. Samph is also the University's primary contact with its regional accreditor, and he continues to be a conduit to the University's Board of Trustees. John Hopkins is Post University's new CEO, as of January 2016. Mr. Hopkins is responsible to the Board of Trustees for the University's operations, and he oversees University strategy and direction. He is the ultimate decision maker regarding strategic initiatives and operations.

Dr. Don Mroz, President, has been with the organization since 2008, and President for three years. Dr. Mroz has primary responsibility for academic program approvals and standards for academic rigor as well as instructional integrity for all instructional modalities.

Post University assigns responsibility for strategic planning and daily oversight to an Executive Team comprised of personnel that are independent of its parent company:

- John L Hopkins: Chief Executive Officer
- Scott Allen, MBA: Chief Financial Officer
- Donald Kelly: Vice President of Human Resources
- Don Mroz, Ph.D.: President
- Bobby Reese, Jr.: Chief Enrollment Services Officer
- Richard Schechter: Chief Marketing Officer
- Michael Statmore: Chief Information Officer
- Sharon Sweeney: Vice President of Student Finance

Physical Facilities: Post University does not have any physical locations in the State of Iowa.

Accreditation: Post University is accredited by the New England Association of Schools and Colleges, a regional accreditation agency recognized by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 13.1%. For comparison purposes, the FFY 2012 national average cohort default rate is 11.8%.

Graduation Rate: 30%. This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education.

Average Loan Debt upon Graduation: \$29,609 (institution-wide).

Record Preservation: Post University permanently preserves all student records in the Registrar's Office at 800 Country Club Road, Waterbury, CT 06723. Student records are never destroyed.

Post University runs hourly backups on all systems which are stored locally and off site at a secure facility. The University runs software on all systems that detects any personal identifiable information and provides the user or administrator with options to shred or secure the information. On the fringe of the University's network we have redundant firewalls with intrusion protection, application and port controls. All student and staff network traffic is isolated and separated at the University's core switches. The University is seeking to further enhance its systems with yet another disaster recovery plan in addition to current back-up processes.

Transcript Requests: Any current or former student may request a transcript by filling out a transcript request form, located at <a href="http://post.edu/docs/default-source/registrar/online-transcript-form.pdf?sfvrsn=0">http://post.edu/docs/default-source/registrar/online-transcript-form.pdf?sfvrsn=0</a>. The official transcript is typically not given to a student or graduate of Post University, but is mailed directly to the institution or individuals considering the applicant for admission or employment, that are requesting the transcript. Students can obtain copies of their transcripts, not the original. The request must reach the office at least one week prior to the transcript being issued. However, in the months of December and May, the transcript request may take up to two weeks to process. The student must pay the University \$10 for an official transcript and \$3 for an unofficial transcript.

Instructional Methodology: Post University works to involve their online students as much as possible to give them an on-campus feel without having to be on-campus physically, with plenty of interaction with their fellow students as well as instructors. Post University uses the Blackboard Learning Management System, online student portal, and online system server. Students will have no specific class times or strict login times, but will still be held accountable with their highly involved professors and classmates. Courses emphasize group discussion, and professors offer feedback on work and performance in real time. Class discussions serve as focal point of contact and academic discussion for faculty and students. Advisors communicate with students regularly via the online portal, email, and through phone calls.

Student Learning Resources: Online access to the Traurig Library and Learning Resources Center <a href="http://www.post.edu/resources-for-current-students/library/virtual-library">http://www.post.edu/resources-for-current-students/library/virtual-library</a> is available to students through Blackboard under the Library tab. The Traurig Library offers more than 300 print and online periodical titles, a growing e-book and virtual reference collection, a cataloged government documents depository, specialized collections of legal reference sources, and a unique equine

management print and media collection, and 22 online databases supporting both undergraduate and graduate programs. Some of these databases include:

- Ebscohost: 35 databases that offer access to more than 10,000 journals and over 135,000 e-books across all disciplines, including business, sociology, human services, psychology, and more. Many of the journals are full text.
- Lexis Nexis: Available on Blackboard course shells, and provides resources for legal, business, and in-depth world news.
- WestLaw Next: Comprehensive law database.
- IBIS World: Collection of industry market research reports, containing industry information from over 700 companies with PDF download of reports available.
- Credo Reference: Access to hundreds of encyclopedias, dictionaries, thesauri, quotations and subject specific titles, as well as 200,000+ images and audio files and nearly 100 videos. Available directly on Blackboard course shell, Library tab.
- Reference USA: Allows students to search for detailed information about more than 13 million businesses in the United States. Available on Blackboard course shell, under Library tab.
- Traurig Library Online Catalog: Allows students to verify if materials needed are available for circulation, and if they are not, students are encouraged to contact a librarian. The catalog is located at <a href="http://tpu-verso.auto-graphics.com/MVC/">http://tpu-verso.auto-graphics.com/MVC/</a>.

Post University also participates in iCONN, the Connecticut State Virtual Library. This resource gives students access to an extensive variety of general and subject specific databases that include local, national and international newspapers, business journals, and history resources.

Online library resources are accessible to students twenty-four hours a day, seven days a week. Students with additional questions or who need further assistance can contact a librarian via chat, phone call, email, or through Blackboard. The Library employs three professional librarians and seven community student library assistants to provide academic support to all constituents across all modalities.

Library hours are as follows (hours are subject to change during intersession, finals, and holidays):

Monday – Wednesday: 8:00am – 10:00pm

Thursday: 8:00am – 8:00pm Friday: 8:00am – 5:00pm Saturday: 10:00am – 4:00pm Sunday: 2:00pm – 8:00pm

The summer hours are slightly different, and are as follows:

Monday - Thursday: 8:00am - 5:00pm

Friday: 8:00am – 4:00pm Saturday: 10:00am – 4:00pm

Sunday: Closed

Students needing academic help have access to the University Learning Center, Tutoring Services and the Writing Center. The University Learning Center <a href="http://www.post.edu/resources-for-current-students/university-learning-center">http://www.post.edu/resources-for-current-students/university-learning-center</a> is available to students at no additional cost. Student who may be struggling with a class or subject, or who just need one-on-one assistance may contact the Center. Tutoring services are available in a wide range of subjects. Post University provides access to Tutor.com to all students. This is an online tutoring service that is available twenty-four

hours a day, seven days a week at no additional cost. Tutor.com can be accessed from Blackboard, under Academic Support. The University Writing Center works with students to refine their organization, critical thinking, grammar, structure, and style skills, so the student can produce quality written and presentation materials. To request assistance, a student may fill out the form at <a href="http://post.edu/resources-for-current-students/university-learning-center/writing-center">http://post.edu/resources-for-current-students/university-learning-center/writing-center</a> or he/she can contact the Center via email.

Curriculum Evaluation and Development: All online courses must be designed to meet the outcomes as outlined in a common set of guidelines called Master Course Alignment Documents (MCADs). The MCAD is the document on which the syllabi for all course modalities (online and face-to-face) are based. It acts to unify the instruction and course design across these modalities. The MCAD contains a course description, required textbook(s), mandatory course content and assignments, course outcomes, and designated assignments for use in assessments of each course outcome. The MCAD also aligns the course to the University's general education outcomes and the program's student learning outcomes. MCADs are developed by faculty and approved through the University Senate.

In addition to the MCAD, undergraduate curricula and courses begin with review by the program's School or Department. Once the content has been approved, it is forwarded for review by the Undergraduate Curriculum Committee (UCC), to the University Senate. Final approval rests with the University Provost. Graduate program content and quality is overseen through individual review by each School. The School that sponsors the program then advances graduate program content changes to the Graduate Studies Committee for approval. Final approval for graduate program changes also rests with the University Provost, much like the undergraduate process. The only difference between the undergraduate and graduate curricula review process is that the University Senate is welcome to comment on, but not govern, graduate curricula.

Student Complaints Process: Post University encourages students to contact their academic advisors, professors, or the relevant department head directly if the student encounters any problems. If the student prefers not to do so, there is an alternate route they can take. Students can file a complaint through a more formal process. Students are advised to put their concerns in writing and carefully document the events that led to the issue. At <a href="http://www.post.edu/about/student-satisfaction-and-performance/student-complaints">http://www.post.edu/about/student-satisfaction-and-performance/student-complaints</a>, the University provides email contact information for the various University departments to which a student may direct a complaint about a matter relating to that department. The departments include Academic Affairs, Admissions, Disability Services, Financial Aid, Information Technology (IT), International Student Services, Career Services, Registrar, Military, and State-by-State.

The steps that are taken after a student files a formal complaint depend on the type of complaint and the University department to whom the complaint is delivered. Typically, if a student has a complaint, it is because they are in disagreement with a decision that has been made. The types of complaints are generally handled through the various appeal processes that exist. These appeal processes are posted online (<a href="http://www.post.edu/studentcomplaintprocess.shtml">http://www.post.edu/studentcomplaintprocess.shtml</a>) and in the University's Catalog at <a href="http://www.post.edu/docs/default-source/academic-programs-policies-services/2016-17\_universitycatalog\_final-june.pdf?sfvrsn=0">http://www.post.edu/docs/default-source/academic-programs-policies-services/2016-17\_universitycatalog\_final-june.pdf?sfvrsn=0</a>. If a student is unhappy with the response that they receive directly from a department that does not have a formal appeal process, the student may participate in the University-wide appeal process. This option is provided to them by their Academic Advisor and involves submitting documentation to <a href="majorated-appeals@post.edu">appeals@post.edu</a>. As part of this registration application review, the University discovered that its University-wide appeal process

is not posted on its website. As of the date of this report, the University is in the process of revising its website to include this information.

If a student with a complaint contacts a department directly, the student should expect to receive within 48 hours an initial response stating that the department has received the student's concern and is initiating a review. Depending on the nature of the concern, it may take time to determine a solution, but the University department keeps the student and the student's Academic Success Counselor apprised of progress. If the student participates in a department's appeal process, they should receive a response within two weeks. This time period is dependent on when the appeals committee for that department will next meet.

If the student is unhappy with the response he or she receives after an appeals process, the student is welcome to elevate their concern to the next level (e.g., Provost, President, etc.). If a student feels that he or she has exhausted the University's grievance process, the student may chose to contact the CT Office of Higher Education or the New England Association of Schools and Colleges (NEASC). Contact info for these bodies is provided at the link above.

An lowa resident student who believes that his or her complaint remains unsatisfactorily resolved by the University may also refer the complaint to the lowa College Student Aid Commission. The contact information for the lowa Student Aid Commission is located at <a href="http://www.post.edu/about/student-satisfaction-and-performance/student-complaints">http://www.post.edu/about/student-satisfaction-and-performance/student-complaints</a>.

## **Programs Offered In Iowa**

Post University is requesting to offer the following programs to lowa residents. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student are provided for each program.

## Undergraduate Certificate Programs

Certificate in Accounting: \$21,600

Finance Certificate: \$18,000

• Forensic Accounting Certificate: \$10,800

Game Design and Animation Certificate: \$14,700

Human Resource Management Certificate: \$11,025

• Legal Nurse Consulting Certificate: \$18,000

Paralegal Certificate: \$18,000

## Associate Degree Programs

Associate of Science in Accounting: \$36,000

Associate of Science in Criminal Justice: \$36,000

• Associate of Science in Early Childhood Education: \$32,400

Associate of Science in Legal Studies: \$36,000

Associate of Science in Management: \$36,000

Associate of Science in Marketing: \$36,000

## Baccalaureate Degree Programs

- Bachelor of Science in Child Studies: \$64,800
- Bachelor of Science in Computer Information Systems: \$72,000
- Bachelor of Science in Accounting: \$72,000
- Bachelor of Science in Business Administration: \$72,000
- Bachelor of Science in Criminal Justice: \$72,000
- Bachelor of Science in Finance: \$72,000
- Bachelor of Science in Human Services: \$72,000
- Bachelor of Science in International Business Administration: \$72,000
- Bachelor of Science in Legal Studies: \$72,000
- Bachelor of Science in Management: \$72,000
- Bachelor of Science in Marketing: \$72,000
- Bachelor of Science in Nursing (RN to BSN): \$29,300
- Bachelor of Arts in Psychology: \$72,000
- Bachelor of Science in Sport Management: \$72,000
- Bachelor of Arts in Communication and Media Studies: \$75,900
- Bachelor of Science in Instructional Design and Technology: \$68,100

## Graduate Certificate Programs

- Graduate Certificate in Corporate Innovation: \$9,120
- Graduate Certificate in Alcohol and Drug Counseling: \$6,750
- Graduate Certificate in Entrepreneurship: \$9,120
- Graduate Certificate in Finance: \$9,120
- Graduate Certificate in Higher Education Administration: \$6,600
- Graduate Certificate in Leadership: \$9,120
- Graduate Certificate in Marketing: \$9,120
- Graduate Certificate in Online Teaching: \$6,600
- Graduate Certificate in Performance Management: \$9,120
- Graduate Certificate in Professional Counseling: \$6,600
- Graduate Certificate in Project Management: \$9,120
- Graduate Certificate in Non-Profit Management: \$8,340

## Masters Degree Programs

- Master of Science in Human Services: \$22,150
- Master of Business Administration: \$34,200
- Master of Business Administration, Healthcare: \$36,330
- Master of Science in Accounting: \$20,250
- Master of Education: \$19,800
- Master of Public Administration: \$22,150

\*Field Experiences: Select distance education programs that Post University wishes to offer Iowa residents either require a field experience or provide the option for a field experience that the student will participate in at an Iowa Iocation. Those programs and the field experience course content are as follows:

- Legal Nurse Certificate: Students complete 120 hours per semester in a law office setting, which could include a law firm, a corporate legal department, or a government agency.
- Certificate in Paralegal Studies: Students complete 120 hours per semester in a law office setting, which could include a law firm, a corporate legal department, or a government agency.
- Bachelor of Science in Legal Studies: Students complete 120 works per semester in a law office setting, which could include a law firm, a corporate legal department, or a government agency.
- Bachelor of Science in Child Studies: Students complete 100 hours in an early care and
  education classroom. Students must display competencies in analyzing case studies,
  planning and carrying out appropriate lessons to promote young children's cognitive,
  creative, language and literacy, social and emotional development. Students will use local,
  state and national standards as the basis of their work.
- Bachelor of Science in Computer Information Systems (CIS): Students receive practical
  experience in CIS in the private or public sector under the supervision of a practicing
  professional. Students must complete at least 90 hours during the semester in a computer
  facility.
- Bachelor of Science in Human Services: This program includes two courses which provide
  prospective human services workers with an opportunity to learn experientially at a human
  services agency in the community. In these courses, students focus on how the agency
  functions and gain experience working with a professional within the agency. Students
  complete 180 hours of fieldwork in both courses. Students must complete each course at a
  separate agency.
- Master of Science in Human Services: Students complete two practicum courses for a total
  of six credit hours. Students will conduct direct service activities at a practicum site that
  specializes in the student's area of concentration. Students may choose between two sets of
  two courses each: Field Practicum I and Field Practicum II; or Advanced Field Practicum I
  and Advanced Field Practicum II. In Field Practicum I and II, the student spends a minimum
  of 180 clock hours providing services under the supervision of a preceptor. In the Advanced
  Field Practicum I and II, the student spends a minimum of 550 clock hours providing services
  under the supervision of a preceptor.

#### **Registration Compliance**

As required by Iowa Code Section 261B.4, Post University submitted a policy for refunding tuition charges to withdrawn students. Since Post University is a for-profit institution, its tuition refund policy must comply with Iowa Code Section 714.23. During the registration evaluation process, Post updated its tuition refund policy for Iowa residents who withdraw from the University's online programs and discloses the policy on its website at <a href="http://post.edu/about/state-approvals">http://post.edu/about/state-approvals</a>.

Administrative rules for registered schools specifically require a school to comply with the requirements of Chapter 261.9(1) "e" through "h".

lowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and
alcohol abuse policy that includes sanctions for violation of the school's policy and
information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code
Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that
includes information about counseling opportunities and reporting instances of sexual abuse
to school officials and law enforcement. These requirements duplicate policies and

disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. Post University maintains drug and alcohol prevention policies, penalties for drug/alcohol violations and sexual violence policies/resources in its 2016-2017 Catalog, Student Handbook as well as the Employee Handbook and Employee Assistance Program Brochure. Post University also requires all staff and faculty to sign a Drug Free Work Place Policy form. Staff can access and log into <a href="https://portal.adp.com/public/index.htm">https://portal.adp.com/public/index.htm</a> for more information. The following resources are available to both students and faculty:

- ✓ http://www.post.edu/resources-for-current-students/counseling/counseling-services
- √ http://www.post.edu/resources-for-current-students/campus-security
- √ http://www.post.edu/resources-for-current-students/counseling/resources
- ✓ <a href="http://www.post.edu/resources-for-current-students/counseling/students-in-distress">http://www.post.edu/resources-for-current-students/counseling/students-in-distress</a>
- √ <a href="http://www.post.edu/resources-for-current-students/counseling">http://www.post.edu/resources-for-current-students/counseling</a>
- √ <a href="http://post.edu/docs/default-source/academic-programs-policies-services/2016-2017">http://post.edu/docs/default-source/academic-programs-policies-services/2016-2017</a> universitycatalog final.pdf?sfvrsn=0
- ✓ http://www.post.edu/resources-for-current-students/student-affairs/drug-policy
- √ http://go.post.edu/misconductreporting/Default.aspx
- ✓ http://www.post.edu/resources-for-current-students/student-affairs/sexual-misconduct
- ✓ <a href="http://post.edu/docs/default-source/mc-student-campus-life/undergradhandbook2015-16.pdf?sfvrsn=0">http://post.edu/docs/default-source/mc-student-campus-life/undergradhandbook2015-16.pdf?sfvrsn=0</a>
- lowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fee charges for members of the lowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (lowa) state or federal military duty or service. During the registration evaluation process Post University adopted this policy and posts the policy on the University's tuition and financial aid section for military <a href="http://post.edu/military/tuition-and-aid/tuition-refunds">http://post.edu/military/tuition-and-aid/tuition-refunds</a>.
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy for employees who in the course of their employment, attend, examine, counsel, or treat a child to report suspected incidents of child physical or sexual abuse to law enforcement and to the school. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this new policy now applies to lowa's registered schools who compensate one or more parties to conduct instruction or other operational activities on the school's behalf at an lowa location. During the registration evaluation process, the University adopted a policy that meets this requirement, which is disclosed to lowa-based employees during the employee orientation process.

Student Consumer Information: In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs. The University provides this information to prospective students in its Catalog at <a href="http://post.edu/docs/default-source/academic-programs-policies-services/2016-2017">http://post.edu/docs/default-source/academic-programs-policies-services/2016-2017</a>

<u>universitycatalog\_final.pdf?sfvrsn=0</u> and on its state approval webpage at http://www.post.edu/about/state-approvals.

Post University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7, which state that provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University will disclose its authorization by the Commission, the Commission's contact information, and the Commission's online student complaints page in a combination of Post University web pages that provide student consumer and accreditation/licensing information, as follows:

- http://www.post.edu/about/state-approvals
- <a href="http://www.post.edu/about/student-satisfaction-and-performance/state-by-state-complaint-process">http://www.post.edu/about/student-satisfaction-and-performance/state-by-state-complaint-process</a>

Financial Responsibility: Post University is a wholly-owned subsidiary of Post Education, Inc. Post University provided a copy of an independent audit of the school as of June 30, 2015, conducted by the independent auditing firm Almich & Associates. The auditing firm expressed its opinion that the corporation's financial statements presented fairly, in all material respects, the financial position of Post University, Inc. as of June 30, 2015.

- A nonpublic school that participates in the federal student aid programs must maintain a
  composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order
  to be determined financially responsible without additional oversight. Post University's
  composite score for the institutional fiscal year ending in 2014 as verified by the federal
  Department of Education was 1.9.
- A for-profit school that participates in the federal student aid programs must demonstrate that
  no more than 90% of its revenue is derived from Title IV funding. Post University's
  independent audit report indicates that, for the institutional fiscal year that ended June 30,
  2015, the University's calculation of the percentage of its income derived from Title IV
  funding was 78.6%.

lowa Resident Full-Time Faculty Member or Program Coordinator: Post University provided two resumes of lowa resident part-time faculty members. Both of these instructors hold doctoral degrees in organization and management, with emphasis in general business and leadership. One of these instructors has been involved in a large number of various projects and has extensive professional experience. The second instructor has been involved in community services. Since Post University applied for registration to offer only distance education programs to lowans, the University is not required to employ a full-time faculty member or program coordinator devoted to lowa students.

Instructional Staff Qualifications: In the undergraduate programs, out of 76 faculty members reviewed, two hold baccalaureate level degrees. One faculty members who holds a Bachelor of Science in Accounting is also a certified public accountant as well as a senior bank manager. The second instructor holds a Bachelor of Arts in English and is completing a MBA in Corporate Innovation. This instructor has over 25 years of diverse organizational development and human resource experience. Of these 76 instructors, 36 hold masters degrees. These degrees vary over a large number of subjects, such as but are not limited to: business administration, computer science, child studies, fine arts, education, leadership, management, marketing, psychology, and sociology.

A large number of the instructors within the criminal justice department hold Lieutenant, Sergeant, and Captain positions within their local police departments. One of these instructors was an Assistant Deputy Chief prior to retirement. Many of the instructors hold dual degrees and some are working toward their doctorate degrees. Of the 76 faculty reviewed, 38 hold doctorate degrees. The areas of expertise include, but are not limited to: biochemistry, criminal justice, computer science and engineering, communication sciences, education, law, psychology, and sociology. Eight are Juris Doctors, one of whom is serving a second, eight-year term with the Connecticut Superior Court. A number of the instructors with doctorate degrees have completed post-doctoral studies.

In the graduate program, out of 22 faculty members reviewed, four hold masters degrees. Those degrees are in finance, library science with an executive MBA certificate, clinical social work, and community counseling. Out of the 22 instructors, 18 hold doctoral degrees. These degrees vary over the following fields: applied management decision sciences, business, clinical social work, education, law, management, and organization and management. Some of the instructors teach in both the undergraduate and graduate programs.

Commitment to Iowa Students and Teach-Out: Post University's registration application includes a written statement from Post University Chief Executive Officer (CEO) Thomas Samph, who was in the leadership position at the campus at the time of the application. CEO Samph acknowledged the requirements of Iowa Code Chapter 261B for the delivery of programs offered in Iowa, and agreed to provide efforts to assist students in finding alternative programs or to complete the program at the University prior to the University ceasing operations.

Student Complaints: None.

## Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Post University has filed satisfactory evidence of financial responsibility under lowa Code Section 714.18, including a corporate surety bond in the amount of \$50,000 payable to the State of Iowa and issued by Hartford Fire Insurance Company.

Section 714.23 – State Tuition Refund Policy

Post University maintains a tuition refund policy for lowa resident students who withdraw from its online programs that is compliant with lowa Code Section 714.23. The University discloses the policy to students at <a href="http://post.edu/about/state-approvals">http://post.edu/about/state-approvals</a>.